

The motion is TERMINATED. The requested amendments to the case management order will be discussed at the March 23, 2021 case management conference in conjunction with the proposed amendment of deadlines in Case No. 3:20-cv-809. The April 15, 2021 case management conference in this case is CANCELLED.

*Alistair E. Newbern*

Alistair E. Newbern  
U.S. Magistrate Judge

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

COLONIAL PIPELINE COMPANY	)	
	)	
<i>Plaintiff/Counter-Defendant</i>	)	
	)	Case No. 3:20-cv-00666
v.	)	
	)	Judge William L. Campbell, Jr.
METROPOLITAN NASHVILLE AIRPORT	)	Magistrate Judge Alistair E. Newbern
AUTHORITY;	)	JURY DEMAND
	)	
<i>Defendant/Counterclaimant</i>	)	
	)	
AECOM TECHNICAL SERVICES, INC.	)	
	)	
<i>Defendant</i>	)	

**PLAINTIFF'S MOTION TO AMEND  
INITIAL CASE MANAGEMENT ORDER**

Plaintiff Colonial Pipeline Company (“Colonial”) requests that the Court amend the Initial Case Management Order in this case (Docket No. 50), and respectfully states as follows:

1. The parties are continuing to engage in mediation discussions through the week of March 15, 2021, with an in-person mediation session scheduled for March 16, 2021, and will submit a joint status report by March 19, 2021 as ordered by the Court (Docket No. 54).
2. Colonial respectfully submits that some of the deadlines should be changed to allow sufficient time for the parties to continue to focus on trying to reach a resolution before any deadline in the Case Management Order runs or necessitates activities that can be avoided if a settlement is reached in the current mediation.
3. The current deadlines were set when an earlier trial date was contemplated (which was changed in the Court’s Order setting this case for trial (Docket No. 51)), and can be modified without adversely affecting the parties’ ability to prepare for trial. The proposed modifications

below also comply with Local Rule 16.01(h)(1) (“Absent court order, no dispositive motion deadline, including response and reply briefs, shall be later than ninety (90) days in advance of the target trial date.”).

4. Accordingly, Colonial respectfully requests that certain deadlines in the Case Management Order be changed per the chart below:

Item	Current Deadline	Proposed Deadline
Joint report on status of mediation	3/19/21	No change
Serve written discovery	3/12/21	<b>No deadline</b>
Amend or add parties	3/31/21	No change
Subsequent case management conference	4/15/21	<b>3/23/21 (to be held with the case management conference in Case No. 3:20-cv-00809)</b>
Complete all written discovery and depose all fact witnesses	6/1/21	<b>7/30/21</b>
File discovery motions	6/15/21	<b>8/13/21</b>
Plaintiff to identify and disclose all expert witnesses and expert reports	7/30/21	<b>9/30/21</b>
Defendant to identify and disclose all expert witnesses and expert reports	9/1/21	<b>28 days after Plaintiff disclosure</b>
File dispositive motions	9/7/21	<b>11/5/21</b>
Complete expert depositions	11/1/21	<b>28 days after Defendant disclosure</b>

5. This request does not affect the current trial date of April 12, 2022, set in the Court’s Order dated February 5, 2021 (Docket No. 51).

6. The undersigned has conferred with counsel for the other parties in this action. AECOM has no objection to the request, but the parties would like to discuss these dates and a discovery plan at the status conference set for Case No. 3:20-cv-00809, presently set for March 23, 2021.

Respectfully submitted,

s/ Brian M. Dobbs

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J. Andrew Goddard (BPR No. 6299)

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## **CERTIFICATE OF SERVICE**

I certify that I filed this document electronically using the Court's electronic case management system, which will send notice to:

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